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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL TRADE

MEMO ENCLOSED

December 28, 2011

**VIA HAND DELIVERY**

Honorable Frank Maas  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

The January 13<sup>th</sup> conference was  
set up to follow Judge Daniels' conference  
earlier the same day and obviously  
involves numerous parties. I

Therefore am unwilling to move it  
simply to address these discrete issues. We  
can address the issues at the February 15

**Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570** conference

Dear Judge Maas:

and make any necessary adjustment in  
the discovery schedule for WAMY or their time

We represent Defendants World Assembly of Muslim Youth Saudi Arabia and  
World Assembly of Muslim Youth International (collectively "WAMY") in the above  
captioned matter. We respectfully request that this Court postpone the hearing on January  
13, 2012. In the alternative, we respectfully request that this Court hold an additional  
discovery hearing in the third week of January.

Follows,  
USMJ  
12/28/11


Defendant WAMY has tried in earnest and in good faith to meet and confer with  
the Plaintiffs over numerous discovery issues with Plaintiffs' responses to WAMY's  
document requests. In order to resolve issues related to WAMY's First and Second Set of  
Document Requests, WAMY sent numerous letter and email correspondence before the  
April 12, 2011 discovery hearing. Since then, WAMY has conferred with Plaintiffs via  
letter on September 29, via telephone on October 18, via letter on November 16, via letter  
on December 19 and via email on December 22.

WAMY also attempted to meet and confer on its Third Set of Document Requests  
to Plaintiffs via letter dated December 19 and via email on December 22. WAMY's latest  
correspondence to Plaintiffs requested to meet and confer before December 23, 2011.  
Plaintiffs have not responded to any of WAMY's correspondence since November 16,  
2011. WAMY fully intended to submit a letter brief motion to compel in the event the  
parties remained at a stalemate. Due to the holiday schedule and Plaintiffs' lack of  
response to WAMY's December 19 letter, it was not possible for the parties to fully brief  
a motion to compel in accordance with Your Honor's briefing schedule in advance of the  
January 13, 2012 discovery hearing.

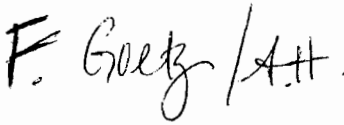
MEMO ENCLOSED

As a result, WAMY respectfully requests that this Court postpone the January 13, 2012 hearing to the week of January 26, 2012 before the close of discovery on January 31. Alternatively, WAMY respectfully requests that this Court schedule an additional discovery hearing during the week of January 26, 2012 so that WAMY may file and be heard on its motion to compel before the end of discovery.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Omar Mohammedi', written over a horizontal line.

Omar Mohammedi, Esq.

A handwritten signature in black ink, appearing to read 'F. Goetz / A.H.', written in a cursive style.

Frederick Goetz, Esq.

cc: All MDL Counsel (via email)